

Exhibit 9

Ronald Parsons

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY
3 Case No. 2:13cv06409-SRC-CLW

4 *****

5 EXCELSIOR INSURANCE CO. a/s/a

6 TEDDY and MARIA VASSILATOS,

7 Plaintiff,

8 v.

9 RALPH A. FIORELLI, individually

10 and d/b/a CROSSROADS PLUMBING &

11 HEATING,

12 Defendant.

13 *****

14

15 DEPOSITION OF RONALD PARSONS

16

17 Friday, October 17th, 2014

9:07 a.m.

18

19 Held At:

20 The Wright Group

125 Rear Stanphyl Road

21 Uxbridge, Massachusetts

22

23 REPORTED BY:

24 Maureen O'Connor Pollard, RMR, CLR, CSR

Ronald Parsons

1 community. And I --

2 Q. Meaning not accepted once it's exposed
3 to a fire?

4 A. Once it's been involved in a fire.
5 And it's not accepted in the fire investigation
6 community whether there's a fire or not.

7 What I did is -- it was interesting
8 how they looked at the annealing. I actually
9 did some research because I wanted to be
10 intelligent when I spoke with you today, lord
11 forbid, right? So what I did is I went
12 through 921, and I went from -- I looked at the
13 2008 version, the 2011 version, and the 2014.
14 And I read the electrical section, which is
15 Chapter 8 on '08 and '11, and Chapter 9 on '14,
16 and there is no mention whatsoever of annealing,
17 or analysis of annealing. There is discussion
18 on grain size, and I accept that, and understand
19 it, and employ that.

20 I then went one step farther, and what
21 I did is I went through our reference library,
22 and I grabbed the journals and documents that
23 are generally accepted in our field. And I'll
24 list them off so that you'll have them.

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1 "Introduction to Fire Dynamics," by Dougal
2 Drysdale. "Principles of Fire Behavior" by
3 James Quintiere. "Investigating the Fire
4 Ground" by Calvin Phillips. "The Investigation
5 of Fires" by Charles Robble. "NFPA Illustrated
6 Dictionary of Electrical Terms" by Brook
7 Stauffer. "Kirk's Fire Investigation" by John
8 Dehaan. "Scientific Protocols for Fire
9 Investigation" by John Lentini. "Fire Test
10 Standards," this is by the American Society of
11 Testing Materials, ASTM. And "The Ignition
12 Handbook" by Vytenis Babrauskas. I went through
13 each and one of these books, which are
14 documents -- or books that we generally use in
15 our field, and not once was annealing ever
16 discussed, never mind applied as a principle for
17 determining high resistance and/or origin of a
18 fire.

19 Q. Well, then, if he indicated to you
20 that annealing showed no signs of high
21 resistance, you would not accept that, because
22 this wire was exposed to a fire, is that right?

23 A. He would have to explain that in
24 detail to me. What I would expect Mr. Sabo to